EPA United States Environmental Protection Agency

Exceptional Events

Exceptional Events Next Steps

- Revisions to the 2007 Exceptional Events Rule (EER)
  - We anticipate proposing the EER revisions in mid-2015 and promulgating EER revisions in mid-2016
  - Schedule provides EER changes in advance of implementation activities for any potential new or revised ozone NAAQS

- Guidance to Support Data Exclusion Requests for Wildfire-Related Events that May Affect Ozone Concentrations
  - Schedule anticipated to parallel EER revision effort
  - Focus on demonstration components and the technical tools available to support criteria in the revised EER

Exceptional Events Rule Revisions

- Rule revisions will focus on statutory language to clarify level of supporting documentation to satisfy approved EE demonstrations with the focus on improved national consistency

- EPA recognizes that there are few readily-available, cost-effective tools that air agencies can use to support ozone-related exceptional event demonstrations under the existing EER. We plan to close that gap.

Tools ⟶ ⟵ EER Criteria

Wildfire/Ozone Guidance

- Developing concurrently with Exceptional Events Rule revisions so that guidance can reflect concepts in proposed rule
  - Focus on statutory elements
  - Examining similarities/shared analyses between but for and clear causal
- Addressing "but for" for wildfire/ozone events
  - Aim to move away from apportionment/attribution approach implied in current "but for," for "obvious" cases
  - Identify bounds/streamlining criteria for wildfire/ozone events – if a demonstration meets certain criteria, the demonstration would satisfy the "but for/clear causal" criteria
  - Air agency would still need to satisfy other Exceptional Event Rule criteria (Affects Air Quality, Historical Fluctuations, Not Reasonably Controllable or Preventable, Human/Natural Event)

Wildfire/Ozone Guidance

- Example criteria to illustrate this concept
  - Element 1 – fire characteristics and relationship to the affected monitor
    - fire emissions
    - distance from the centroid of the fire to the affected monitor
    - High ozone at the monitor
  - Element 2 – coincident back trajectories between fire and affected monitor
  - Element 3 – additional evidence that smoke from the fire reached the affected monitor
    - Visible satellite maps
    - MODIS data and other satellite data of aerosol optical depth, NO2
    - Regional O3 concentration maps
    - Regional PM2.5 concentration maps
    - Regional PM2.5 species maps/plots
    - Levoglucosan